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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Part 97 of the)
Commission's Rules Regarding the)
Radio Amateur Civil Emergency)
Service)

RM- _____

To: The Commission

PETITION FOR RULE MAKING

The American Radio Relay
League, Incorporated

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CPG 1-15 March 1991

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SUMMARY

The American Radio Relay League, Incorporated (the League), the national non-profit association of amateur radio operators in the United States, requests that the Commission issue a Notice of Proposed Rule Making looking toward the relaxation of certain regulations regarding the Amateur Radio Service, and specifically the Radio Amateur Civil Emergency Service (RACES). The League's intention is to permit, to a greater extent than is possible under existing rules, the intercommunication between and among amateur stations active in RACES and those registered with civil defense organizations operating under RACES on the one hand, and other amateur stations actively engaged in support communications in an emergency or disaster situation, and in drills and tests in preparation for the same, on the other. The League also requests the relaxation of present regulations concerning time limitations on emergency drills and tests in RACES.

I. Introduction

1. The most fundamental cornerstone of the basis and purpose of the Amateur Service is the provision of emergency communications for the benefit of the public. The history of Amateur Radio is replete with notable achievements in emergency communications, and the ongoing traditions of Amateur Radio include immediate volunteer response in the provision of communications in and after disasters and emergencies¹. The first of the bases and purposes set forth in Section 97.1 of the Commission's rules for the Amateur Service is the "(r)ecognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, *particularly with respect to providing emergency communications.*" While virtually all individual radio amateurs are alert for opportunities to protect public safety through the use of their amateur stations, there are two principal organizational entities through which amateur radio emergency communications are provided on an organized basis at the national level. One is RACES, and the other is the Amateur Radio Emergency Service (ARES).

¹ Public service communications have been a traditional responsibility of the Amateur Radio Service since 1913, when amateurs at the University of Michigan and Ohio State University, in conjunction with numerous individual amateurs in and around the region, successfully bridged the communications gap surrounding a large isolated area left by a severe windstorm in the Midwest. In the early days, emergency communications were individual efforts, conducted on an *ad hoc* basis. Now, amateur radio emergency communications are highly organized, disciplined, and planned. Notwithstanding modern commercial telecommunication infrastructure, including cellular telephones and the like, the first and only operational communications facilities at major natural disaster sites, and for some time thereafter, are almost inevitably amateur radio.

2. RACES, though part of the Amateur Service, is organized under the supervision and auspices of the Federal Emergency Management Agency (FEMA) and operates at the local level under the jurisdiction of local civil defense agencies. It is defined in the Amateur Rules [47 C.F.R. §97.3(a)(35)] as a "radio service using amateur stations for civil defense communications during periods of local, regional or national civil emergencies." It is a means of providing an opportunity for radio amateurs to serve governmental civil preparedness agencies. The League has signed a memorandum of understanding with FEMA to enhance the coordination of League and FEMA resources, and is supportive of RACES operation.

3. ARES, begun by the League in 1935, is a coordinated emergency communications response organization that is sponsored by the League, though it is not necessary for participants to be members of the League. ARES is a system of networks of radio amateurs active in emergency communications, organized at the Section level (i.e. state or sub-state level). There are approximately 80,000 registered ARES members currently. It is not under the control of local civil defense officials. Instead, it operates under the coordination of Section Emergency Coordinators and Emergency Coordinators (who are League field appointees), and they operate pursuant to local emergency communications plans.

4. For purely historical regulatory reasons, and notwithstanding the impracticality thereof, RACES and ARES have developed and operate independently of each other, though many RACES participants are also ARES members, and vice-versa. Both

organizations are active in most cities and counties in the United States. In some areas of the country, however, RACES is the most active amateur radio emergency communications organization, and in others, ARES is the dominant entity in terms of active participation. Indeed, in some localities, emergency communications by amateur radio is organized at the amateur club level, independently of either RACES or ARES. It would not, at first glance, seem to matter from a regulatory or practical perspective which type of emergency communications entity is chosen by radio amateurs, so long as the service is actually provided when needed. In fact, however, it is the Commission's regulations that prevent RACES members and those registered with civil defense organizations and participate in RACES from communicating with other groups of radio amateurs, and hence precludes RACES and ARES members from working together, during active emergency communications, or even in the preparation for such. The principal rule change sought by the League herein would permit intercommunication between RACES participants and other amateur stations actively engaged in support communications in an emergency or disaster situation, including drills and tests. It would not require such, and would not compel local civil defense organizations to accept any non-RACES volunteer, but it would permit intercommunication with other amateurs active in emergency communications, and enable a form of "mutual aid" in the Amateur Service.

5. Section 97.407 of the Commission's Rules governs RACES operation. Subsections 97.407(c) and (d) state as follows:

(c) A RACES station may only communicate with:

- (1) another RACES station;
- (2) An amateur station registered with a civil defense organization;
- (3) A United States Government station authorized by the responsible agency to communicate with RACES stations;
- (4) A station in a service regulated by the FCC whenever such communication is authorized by the FCC.

(d) An amateur station registered with a civil defense organization may only communicate with:

- (1) A RACES station licensed to the civil defense organization with which the amateur station is registered;
- (2) The following stations upon authorization of the responsible civil defense official for the organization with which the amateur station is registered;
 - (i) A RACES station licensed to another civil defense organization;
 - (ii) An amateur station registered with the same or another civil defense organization;
 - (iii) A United States Government station authorized by the responsible agency to communicate with RACES stations; and
 - (iv) A station in a service regulated by the FCC whenever such communication is authorized by the FCC.

Subsection 97.407(e) limits communications transmitted in RACES to those authorized by the civil defense organization for the area served. Therefore, on the basis of the cited rule section, RACES participants (who are licensed radio amateurs) cannot communicate with other radio amateurs, even when those non-RACES radio amateurs are participants in ARES or other emergency communications efforts and are active in an ongoing disaster relief operation, if those non-RACES amateur stations are not "registered with the same or

another civil defense organization." This is true notwithstanding the fact that participants in each organization may be providing communications for the exact same purposes.² Furthermore, it is impossible even for RACES and ARES members (or other amateur emergency communications groups not registered with the civil defense organizations) to participate together in joint drills and preparation for emergency communications efforts. This is an unnecessary and undesirable situation, which inevitably segregates amateurs engaged in exactly the same types of emergency communications work, and limits the ability of radio amateurs to work together for the benefit of the public. Amendment of the rules to permit intercommunication, without disrupting or interfering with the functions of civil defense managers, or their control over communications transmitted in RACES, is necessary to foster cooperation and intercommunication which is critical in on-site disaster relief, especially in wide-area disasters, such as hurricane aftermaths.

II. RACES

6. Attached hereto as Exhibit A is a copy of FEMA document CPG 1-15 (March 18, 1991) which is the *Civil Preparedness Guide* --

² It has been suggested that ARES members, or other amateur emergency communications groups could simply register with the local civil defense organization in order to be permitted to intercommunicate with RACES participants. However, local civil defense agencies tend to register only RACES participants, due to the level of control that is given them over the operation of RACES stations by the Commission's rules.

Guidance for Radio Amateur Civil Emergency Service. It describes concisely the operation of RACES. RACES was created as a temporary service, to assure that in serious national emergencies, amateurs could be put to immediate use without delays in selecting frequencies and processing security clearances. It was intended to remedy a problem which became notable at the outset of World War II: that there was no plan for the use of amateur stations to provide communications facilities for the authorities that might need them.³ The Commission created RACES by a *Memorandum Opinion and Order*, 42 FCC 224 (1952) in Docket 10102, which adopted a comprehensive set of rules for RACES. Section 12.200 of those rules made the temporary nature of RACES clear. With respect to intercommunication with other amateur stations, the Commission's initial intention was quite flexible:

Local radio amateur civil emergency networks are to be organized by the civil defense authority of the area

³ The FEMA Civil Preparedness Guide, at Section 3-5, describes limitations on the use of RACES stations in *Wartime Emergency Situations* (as distinguished from general limitations on RACES operation). The following is included:

a. While performing duties as a RACES operator, members may not communicate with amateurs who are not RACES members. Only emergency communications may be transmitted as defined in FCC Rules and Regulations. No amateur radio station shall be operated in the RACES unless it is certified as registered in a disaster service organization.

The term "disaster service organization" is not defined in the manual, but it is apparent that the intercommunication limitation between RACES amateur stations and non-RACES amateur stations derives from wartime emergency situations, during which communications security may be a factor. In normal domestic disaster communications situations where there is no wartime emergency, the same justification for the restriction is absent.

concerned, and shall be under the immediate direction of the Civil Defense Radio Officer. Stations in this service may intercommunicate or may exchange messages with stations in other services including stations operated by the United States Government. Communications may relate to any phase of civil defense work whether it be practice tests and drills or communications directly concerning safety of life, preservation of property, maintenance of law and order, or related emergency purposes. Unless the present national emergency intensifies to the extent that normal amateur communication must be suspended, operation of stations in this service, on the frequencies herein provided, must be on a shared basis with normal amateur operation on the same or adjacent frequencies. The Commission expects, however, that all amateurs will give wholehearted cooperation to the civil defense effort and will respect any appropriate request to suspend operation on a particular amateur frequency or frequency band pending completion of bona fide civil defense drills where interference might otherwise be caused to civil defense communications.

42 FCC at 227.

7. The original rules adopted pursuant to that *Memorandum Opinion and Order* included Section 12.253, which permitted RACES stations to communicate, for purpose of exchanging civil defense communications, with any other station in any service provided by the Commission's rules whenever that class of station was authorized by the Commission to communicate with RACES stations. The regulations were quite flexibly stated, and there was no segregation of RACES stations from the remainder of the amateur community. However, over the succeeding two decades, RACES became a permanent element of amateur operation during emergencies. See, e.g. *Revision of RACES Rules*, 36 RR 2d 318 (1976). Additional frequencies and modes of operation were authorized for RACES in Docket 12719 by a Report and Order issued in 1959.

8. In 1973, the Commission adopted a Notice of Inquiry in Docket 19723, asking what amendments to the RACES rules were necessary. It sought comment on the effectiveness of the program, and asked whether it should be continued; if so, what its objectives should be; and what structure it should have to meet its objectives. The comments received in response to that Notice of Inquiry led to a comprehensive review by the Commission not only of the structure of RACES rules, but as well the entire concept of RACES. A Notice of Proposed Rule Making was adopted in 1974⁴ proposing significant changes to the RACES program, and significant deregulation thereof. Several conclusions were reached in 1976 in the Report and Order⁵ in that proceeding, including the following:

(1) Commercial operators cannot operate in RACES, because it is an amateur service and therefore "(t)he proposition that there can be any circumstances whatsoever in which commercial operators may operate on amateur frequencies is contrary to the definition of the service found in §97.3 of the rules and is conceptually unacceptable.

(2) "Consistent with (the Commission's) desire to make RACES an integral part of the amateur service", the Commission made operator privileges in RACES identical to those held in the Amateur Service.

(3) The Commission eliminated the filing of formal RACES emergency communications plans and forms, and FCC certification thereof, stating that it believes "that because RACES is at its base an amateur service, a service traditionally characterized by voluntary cooperation between groups and individuals," concern about informality of communications plans was unfounded.

Notwithstanding these conclusions, and the intention of the Commission to integrate RACES into the Amateur Service, of which it

⁴ FCC 74-609, 39 Fed. Reg. 22282 (June 24, 1974).

⁵ *Revision of RACES Rules, Id.*, 36 RR 2d at 322.

is a part, the Commission in that same proceeding decided to preclude communications between RACES stations and non-RACES amateur stations. The Commission stated:

Several comments alleged that limiting permissible communications of RACES stations and amateur stations participating in RACES to communications with RACES stations and other stations listed in proposed §97.189 would reduce RACES network effectiveness in times of emergency. A few respondents suggested that non-RACES amateurs may be in positions to render valuable assistance to RACES operations in emergency situations, and that, in any event, in light of the proposed amendment in the preceding paragraph, requiring amateur stations participating in RACES to use their amateur call signs, such a prohibition would be unenforceable...At the root of proposed §97.189 is the notion that RACES is a discrete system within the Amateur Service, designed to provide specific types of communications in narrowly defined situations. We believe, therefore, that only those stations registered in RACES should be permitted to communicate with RACES stations, and vice-versa. We would observe, however, that there is nothing to prevent amateur stations registered in RACES from taking part in other organized and unorganized amateur activities and communicating with non-RACES amateur stations in those contexts.

36 RR 2d at 322, 323.

As discussed above, RACES station licensees do indeed participate in ARES and other amateur emergency communications preparedness exercises. However, RACES is not the only prominent emergency communications entity in the Amateur Service, and there is no reason whatsoever why RACES stations should not be permitted to communicate with other amateur stations active in emergency communications exercises or active disaster relief. The regulation hinders, rather than facilitates, amateur radio emergency communications. Nor is the concept of RACES communications, in practice, circumscribed as the Commission anticipated in 1976.

RACES stations are regularly activated, for example, in severe weather alerts, and yet, reports from non-RACES stations as to weather conditions cannot be sought or received during the RACES activation. The practical result of this regulation is that the participants in RACES and non-participants are, no matter what the situation, segregated from each other. The regulation should be eliminated.

9. In Docket 19723, the League argued that it was essential that free interchange of communications between amateur stations and RACES stations be permitted, because:

(A) There are other amateur emergency service organizations, such as ARES and the National Traffic System (NTS) that can provide vital links not available to RACES in any other way. With the relaxation in use of amateur frequencies by RACES stations proposed in Docket 19723, RACES stations could access these networks directly.

(B) On occasion, an isolated amateur station might be the only communications link out of a disaster area. The rules should permit such intercommunication.

(C) Relief agencies such as the American National Red Cross have amateurs supplying communications for them, and RACES stations should be allowed to communicate with them for coordination of efforts and an overall effective and efficient communications effort.

(D) As RACES is a segment of the Amateur Service, it is inappropriate to deny one segment of the Service access to the other especially when operating in an emergency. A single Amateur Service should serve all agencies in an emergency.

(E) There could be no enforcement of the rule, because RACES participants are not registered with the Commission.

Each of these arguments applies with equal force today. It is time that the Commission permit, but not require, communications between

RACES participants and non-RACES amateurs during emergencies or emergency drills and preparedness exercises.

III. Timing of Drills and Exercises

10. Section 97.407(e)(4) of the Commission's Rules currently provides that communications for RACES training drills and tests necessary to ensure the establishment and maintenance of orderly and efficient operation of the RACES as ordered by the responsible civil defense organizations served are permitted, but not for longer than one hour per week; except that not more than twice per year, by approval of the appropriate office of emergency planning, test and drill exercises lasting up to 72 hours may be permitted. While this limitation was created in order to protect against misuse of the Amateur Service frequencies by non-amateur civil defense organizations, it has, in practice, been found to be overly restrictive. The League requests that the restriction be somewhat modified, to permit longer weekly drills and tests for RACES operation; specifically, five hours per week maximum would be reasonable, in order to permit preparation for emergency communications preparedness.

11. Initially, there was no time limitation on RACES hours of operation. Section 12.252 of the Commission's rules in 1952 stated as follows:

Hours of operation. Stations in this service may be operated at such times and under such conditions as may be prescribed by the communications officer or other responsible official of the civil defense organization having jurisdiction over the area which the station will serve, provided that the communications of such stations

shall at all times be in accordance with the permissible communications authorized in this subpart.

Memorandum Opinion and Order, 42 FCC at 258-9.

The time limitation was imposed, over opposition, by the Commission in the 1976 RACES rules changes. In imposing the one hour per week limitation, the Commission stated:

Much concern was also expressed over limiting usage of stations participating in RACES to bona fide civil defense emergencies and a maximum of one hour per week of drills and tests, as proposed in §97.191. Such a limitation in drills, some contended, is unrealistic because it often takes longer than one hour simply to call the roll and attend to other administrative matters on RACES network. We are not persuaded by such arguments. While some of the larger RACES networks may be forced to adopt more efficient methods of operation to comply with the new time limitations, we believe most RACES operations will not be seriously affected...

Revision of RACES Rules, 36 RR 2d at 322.

The Commission's supposition as to the effect of the one-hour limitation has been proven incorrect in practice. The rule should, to permit a reasonable period to conduct RACES drills and exercises for emergency communications preparedness, permit such activities to be conducted during periods of up to five hours per week.

IV. Conclusions

12. The Commission, despite a philosophy of integrating RACES operation into the Amateur Service as a part thereof, largely defeated its own policy by its decision, now twenty years old, to prohibit intercommunication and mutual aid between RACES participants and non-RACES amateur radio operators actively engaged in support communications in an emergency or disaster situation,

including drills and tests. The restriction arguably should never have been enacted in the first place; but in any event, it has outlived whatever utility it may ever have had, and should be among the first regulations eliminated in the Commission's planned "rule-burning" exercise about which the Chairman has recently spoken.

13. Another restriction that has no practical benefit, but which actually inhibits volunteer participation in emergency communications is the one-hour per week limitation on RACES drills and exercises. Amateur radio operators active in RACES are to be trusted to impose the appropriate limitations on RACES operation, and a maximum of five hours per week is a reasonable upper limit for emergency communications drills and tests.

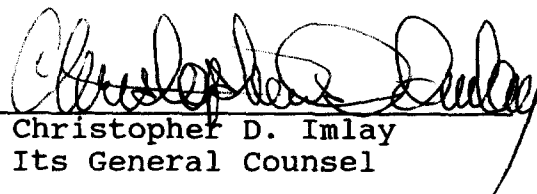
Therefore, the foregoing considered, the American Radio Relay League, Incorporated, respectfully requests that the Commission modify the RACES rules, Section 97.407, as per the attached Appendix, and in accordance with the foregoing.

Respectfully submitted,

**THE AMERICAN RADIO RELAY
LEAGUE, INCORPORATED**

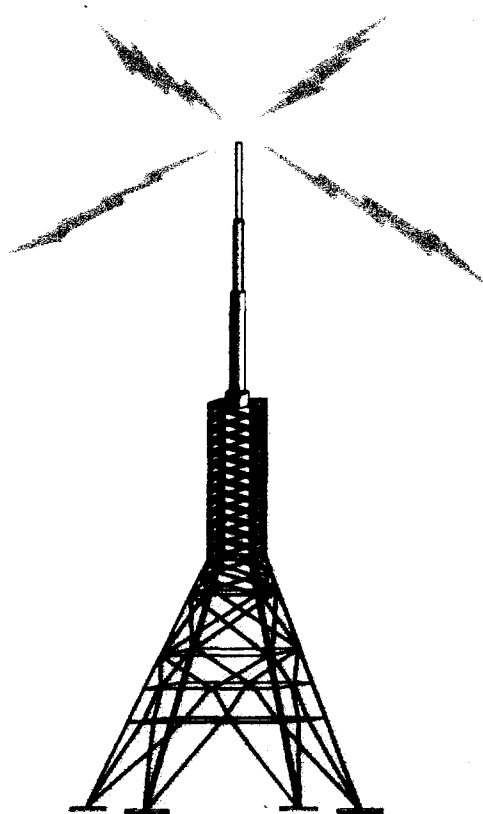
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GUIDANCE FOR RADIO AMATEUR CIVIL EMERGENCY SERVICE





Civil Preparedness Guide

Federal Emergency Management Agency

Washington, D.C. 20472

CPG 1-15

March 18, 1991

Guidance for Radio Amateur Civil Emergency Service

Foreword

This Civil Preparedness Guide (CPG) has been prepared as a reference to assist State and local emergency management officials in establishing and operating Radio Amateur Civil Emergency Service (RACES) capabilities for use in responding to and managing emergencies and disasters. This CPG outlines the procedures for developing a RACES plan and provides an example of a plan format.

A handwritten signature in black ink, reading "Grant C. Peterson", is positioned above the printed name.

Grant C. Peterson
Associate Director
State and Local Programs
and Support Directorate

Distribution: Special

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Chapter 1

General Information

1-1. Purpose. This Civil Preparedness Guide (CPG) provides guidance to State and local governments that utilize Radio Amateur Civil Emergency Service (RACES) as a means of emergency communications.

1-2. Applicability and Scope.

a. The provisions of this CPG are applicable to State and local governments that utilize RACES in emergencies.

b. In cases of conflict, Federal Communications Commission (FCC) Rules and Regulations will take precedence over the provisions of this CPG.

1-3. Authorities.

a. The Communications Act of 1934, Section 606, as amended.

b. Executive Order 12472, Assignment of National Security and Emergency Preparedness Telecommunications Functions.

1-4. Reference. Title 47 Code of Federal Regulations (CFR), Part 97, Subpart F, RACES.

1-5. Background.

a. RACES is an organization of amateur radio operators who volunteer to provide radio communications for State and local governments in times of emergency. Created in 1952 primarily to serve in civil defense emergencies, RACES provides essential communications and warning links to supplement State and local government assets during emergencies.

b. RACES is a special part of the amateur operation sponsored by the Federal Emergency Management Agency (FEMA). RACES provides emergency communications for civil preparedness purposes only. RACES is conducted by amateurs using their primary station licenses or by existing RACES stations. In the event that the President invokes the War Emergency Powers, amateurs officially enrolled in the local civil preparedness group would become limited to certain frequencies, while all other amateur operations would be silenced.

1-6. Definitions.

a. RACES is a radio communications service, conducted by volunteer licensed amateur radio operators, for providing emergency communications support to State and local governments.

b. RACES Station is an amateur radio station licensed to a civil defense organization, at a specific land location, to provide the facilities for amateur radio communications in the RACES.

c. Amateur Radio Communications is noncommercial radio communications by or among amateur radio stations solely with a personal aim and without pecuniary or business interest.

1-7. The Role of State and Local Governments.

a. Local Governments. The role of local governments is to establish and train a RACES organization designed to provide or supplement essential emergency communications within their local jurisdiction.

b. State Governments. The role of State governments is to establish and train a RACES organization designed to provide or supplement emergency communications between elements of State Government and between State and local governments.

1-8. FEMA's Role. FEMA's role is to provide planning guidance, technical assistance, and funding for establishing a RACES organization at the State and local government level.

1-9. Emergency Situations. The RACES organization provides or supplements communications during emergencies where normal communication systems have sustained damage. It may be used in a wide variety of situations, including:

- a. Natural Disasters;
- b. Technological Disasters;
- c. Nuclear Accidents;
- d. Nuclear Attack;
- e. Terrorist Incidents; and
- f. Bomb Threats.

Chapter 2

Eligibility and Procedures for RACES

2-1. General. This chapter provides information on the requirements and procedures for establishing a RACES organization. Operator privileges in RACES are dependent upon the class of license held by the amateur.

2-2. RACES Eligibility. Any United States citizen who possesses a valid FCC Amateur Radio Operator License, technician class or higher, is eligible to become a member of RACES. The services of amateurs who have a Novice Class license may be used, but this is not recommended due to the privilege limitations.

2-3. Procedures for Establishing a RACES Organization. The following procedures are to be followed for establishing a RACES organization:

a. To establish a RACES organization, the Director, State or local government Emergency Operating Center (EOC) or Director of Emergency Management (or designated representative) should first appoint, in writing, a reliable amateur to serve as the RACES Officer. This individual serves as a liaison between the RACES organization and the Director's office and assists in the development of the RACES organization, recruits members, and keeps the Director, EOC, informed of all RACES activities, progress, and needs.

b. The RACES Officer is a General Class Amateur, or higher, thoroughly knowledgeable of FCC Rules and Regulations and familiar with the functions of the Amateur Radio Relay League (ARRL) and the Amateur Radio Emergency Services of the ARRL. Individuals with strong organizational abilities, good verbal and written communications skills, and experience in emergency center operations are ideal candidates.

2-4. Recruitment and Retention.

a. Each prospective member completes a RACES Operator Application and returns it to the RACES Officer. The RACES Officer designs the application to meet local requirements. The application must not contain information that is protected under the Privacy Act. The RACES Officer recommends acceptance or nonacceptance to the Emergency Management Director. Once approval is granted, the Director prepares a letter designating the applicant as a certified RACES member. A photograph identification card for each RACES member is highly recommended.

b. In order to serve effectively as a volunteer member of the emergency staff, access to otherwise restricted areas, such as the EOC or the jurisdiction's communications center, may be associated with RACES participation and assignments. To the extent that similar requirements exist for other members of the emergency staff with access to restricted areas, a limited background check for RACES applicants is also recommended. This should be performed in accordance with the jurisdiction's regulations and procedures.

c. RACES members are responsible for:

- (1) Participating in the training sessions;
- (2) Briefing the RACES Officer of any changes in equipment or amateur status that may affect operation in the RACES program;
- (3) Developing a strong background in emergency procedures, FCC Rules and Regulations, and network procedures;
- (4) Being available when emergency communications are required by the appointing Director;
- (5) Helping strengthen the organization by offering suggestions and positive feedback to correct deficiencies;
- (6) Complying with volunteer standards established by the jurisdiction; and,
- (7) Notifying the RACES Officer, in writing, when terminating membership.

d. Membership participation should be evaluated every 2 years. If a member's participation is lacking, membership terminates; if deemed adequate, membership continues for another 2 years.

2-5. Training.

a. Training sessions should be scheduled to exercise the efficiency of the emergency plan and the proficiency of the RACES members. On the average 1 hour per week should be devoted to RACES activities and training.

b. RACES organizations may be utilized during drills and exercises in order to train members and exercise the emergency plan. RACES exercises will help with updates or revisions to the RACES plan. Special RACES drills and exercises serve as a mechanism for honing skills in emergency communications

procedures in general and for training in any specific or unusual protocols used by the jurisdiction. Periodic participation in full scale exercises is also beneficial in promoting familiarity with other elements of the jurisdiction's emergency plans and procedures the communications function must support.

c. All training must be recorded in the participant's and RACES unit's files.

2-6. Development of a RACES Plan.

a. Once membership reaches a strength that is considered adequate by the RACES Officer, bylaws and an emergency plan that meet local requirements must be written.

b. Development of a RACES plan is vital to the organization and its importance cannot be overemphasized. A plan must be prepared in accordance with the local area needs and the facilities available within that particular area. Written plans must clearly describe each area to be covered. All local government RACES plans are forwarded to the State disaster preparedness communications officer for coordination and retention. All State Government RACES plans are forwarded to the FEMA Regional Communications Officer for coordination and retention.

c. The following items should be addressed, at a minimum, within the plan and provisions made to cover them:

(1) Identify the community or area where coverage is required;

(2) Identify the type of support needed, i.e., shelter, communications, hospital, etc.

(3) Identify the network to be used to provide each type of support, the operating frequency, mode of operation, and location of the network control station for each network;

(4) Establish the RACES Unit's chain of command, identifying the emergency management organization's communications officer (or other official) to whom the RACES unit reports;

(5) Identify frequencies--high frequency and very high frequency--to be used by the mobile, portable, repeater, and fixed stations;

(6) Provide the addresses of all known fixed station locations required to support each network;